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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Erika McCants, an individual; and David Mark  
Gosso, an individual,

Plaintiffs,

v.

United States Postal Service; Ashton Paul  
Yager, an individual; DOE Owners I-V; DOE  
Drivers I-V; ROE Employers I-X; and ROE  
Companies I-X, inclusive, jointly and severally,

Defendants.

Case No. 2:24-cv-02063-CDS-DJA

**STIPULATION FOR EXTENSION  
OF TIME TO FILE RESPONSE TO  
COMPLAINT**

**(SECOND REQUEST)**

The United States of America, on behalf of federal defendants (“United States”), pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, moves this Court for an extension of time up to, and including January 28, 2025, in which to file a response pleading to Plaintiff’s complaint.

This is a lawsuit against the United States under the Federal Tort Claims Act where Plaintiffs allege that Plaintiff David Mark Gosso was driving a vehicle he owned, in which Plaintiff Erika McCants was a passenger, that was involved in a car accident with a United States Postal Service vehicle. Both Plaintiffs claim they were injured as a result. Plaintiff and the United States, through undersigned counsel, agree and stipulate that the United States’ time to respond to the Plaintiff’s Complaint shall be extended to January 28, 2025. This is the second request for extension of time.

1 The extension of time is necessary for the United States' counsel to obtain and review  
2 the relevant information relating to the alleged traffic incident from the United States Postal  
3 Service to properly respond to the allegations in Plaintiff's complaint.

4 Therefore, the parties request that the Court extend the deadline for the United States  
5 to file a responsive pleading to Plaintiff's Complaint to January 28, 2025.

6 Respectfully submitted this 30th day of December 2024.

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8 JASON M. FRIERSON  
United States Attorney

9 /s/ Jacob G. Leavitt  
10 JACOB G. LEAVITT  
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11 Las Vegas, Nevada 89102

/s/ Karissa D. Neff  
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12 *Attorney for Plaintiff*

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14 **IT IS SO ORDERED:**

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**UNITED STATES MAGISTRATE JUDGE**

17 **DATED:** 12/31/2024  
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